

PETER M. ANGULO, ESQ.  
Nevada Bar No. 3672  
JOSEPH R. SMITH, ESQ.  
Nevada Bar No. 13961  
**ANGULO LAW GROUP, LLC**  
5545 S. Mountain Vista Street, Suite F  
Las Vegas, NV 89120  
Tel: (702) 384-8000  
Fax: (702) 384-8200  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\*\*\*\*\*

JUANA SEGURA-ZACARIAS,

Plaintiff,

vs.

WAL-MART, INC.; et al.

Defendant(s).

Case No.: 2:21-cv-00625-CDS-NJK

**STIPULATION AND ORDER TO EXTEND**  
**RESPONSIVE DEADLINES**

**[FIRST REQUEST]**

Plaintiff JUANA SEGURA-ZACARIAS ("Plaintiff") and Defendant WAL-MART, INC. ("Defendant" or "Walmart"), by and through their respective counsel of record do hereby recite and stipulate the following: On Thursday, May 12, 2022, Defendant filed Defendant Walmart Inc.'s Motion for Summary Judgment. On Friday, May 13, 2022, Defendant filed Defendant Walmart Inc.'s Motion to Exclude Testimony of Alex Balian. Pursuant to LR 7-2(b), Plaintiff's response to Defendant's Motion for Summary Judgment is due on or before Thursday, June 2, 2022, being twenty-one (21) days after service of the motion, and Plaintiff's response to Defendant's Motion to Exclude is due on or before Friday, May 27, 2022, being fourteen (14) days after service of the motion.

THE PARTIES HEREBY STIPULATE as follows:

1. Plaintiff's response to Defendant's Motion for Summary Judgment, filed May 12, 2022, shall be enlarged by seven (7) days to be due on or before Thursday, June 9, 2022;
2. Plaintiff's response to Defendant's Motion to Exclude Testimony, filed May 13, 2022, shall be enlarged by seven (7) days to be due on or before Friday, June 3, 2022;

3. In corresponding fashion, Defendant's respective reply in support of its Motion for Summary Judgment shall be enlarged by seven (7) days to be due on or before Thursday, June 16, 2022.

4. Defendant's respective reply in support of its Motion to Exclude Testimony shall be enlarged by seven (7) days to be due on or before Friday, June 10, 2022.

The parties aver this stipulated extension of the briefing schedule as to the motion practice described herein is made in good faith and not for the purpose of delay.

DATED this 23<sup>rd</sup> day of May, 2022.

DATED this 23<sup>rd</sup> day of May, 2022.


ANGULO LAW GROUP

ALVERSON TAYLOR & SANDERS

By /s/ Joseph R. Smith  
PETER M. ANGULO, ESQ.  
Nevada Bar No. 003672  
JOSEPH R. SMITH, ESQ.  
Nevada Bar No. 013961  
5545 S. Mountain Vista Street, Suite F  
Las Vegas, Nevada 89120  
*Attorneys for Plaintiff*

By /s/ Kurt R. Bonds  
KURT R. BONDS, ESQ.  
Nevada Bar No. 6228  
6605 Grand Montecito Parkway, Suite 200  
Las Vegas, Nevada 89149  
*Attorneys for Defendant*

**IT IS SO ORDERED:**

  
**UNITED STATES DISTRICT JUDGE**

**DATED:** May 25, 2022

**manthis@angulolawgroup.com**

---

**From:** Kurt Bonds <KBonds@AlversonTaylor.com>  
**Sent:** Monday, May 23, 2022 8:36 AM  
**To:** 'Joseph Smith'  
**Cc:** Margaret Anthis  
**Subject:** RE: Segura v. Walmart, Inc. (2:21-cv-00625-CDS-NJK), Proposed SAO to Extend Briefing Schedule

You may affix my signature.

---

**From:** Joseph Smith <jrs@angulolawgroup.com>  
**Sent:** Friday, May 20, 2022 4:59 PM  
**To:** Kurt Bonds <KBonds@AlversonTaylor.com>  
**Cc:** Margaret Anthis <manthis@angulolawgroup.com>  
**Subject:** Segura v. Walmart, Inc. (2:21-cv-00625-CDS-NJK), Proposed SAO to Extend Briefing Schedule

Mr. Bonds,

This afternoon I called and spoke with who I understand to be your executive assistant. I called to propose a brief extension to the briefing schedules for Defendant's Motion for Summary Judgment and Motion to Exclude Testimony in light of an appellate brief I have due at the end of next week. She expressed a week-long enlargement to the respective responsive deadlines would be agreed.

Attached, please find Plaintiff's proposed Stipulation and Order to Extend Responsive Deadlines as to said motions. Please advise as to any proposed changes, or provide permission to otherwise affix your e-signature for submission to the Court.

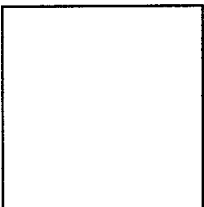
Thank you for your consideration and professional courtesy,

--

**JOSEPH ROBERT SMITH, ESQ.**

Angulo Law Group, LLC  
5545 S. Mountain Vista Street, Suite F  
Las Vegas, Nevada 89120  
P: 702.384.8000  
F: 702.384.8200  
E: [jrs@angulolawgroup.com](mailto:jrs@angulolawgroup.com)

**\*\*Confidentiality Note:** This communication (including any attachments) is not intended or written to be used, and it cannot be used, for the purpose of avoiding tax penalties that may be imposed on the taxpayer. This transmission is intended only for the use of the addressee and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient, any use of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately.



AV®, AV Preeminent®, Martindale-Hubbell DistinguishedSM and Martindale-Hubbell NotableSM are Certification Marks used under license in accordance with the Martindale-Hubbell® certification procedures, standards and policies. Martindale-Hubbell® is the facilitator